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(NASA Only)

Subject: Management of Government Quality Assurance Functions for NASA Contracts (w/change 1, dated 8/9/2010)

Responsible Office: Office of Safety and Mission Assurance

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Chapter 4. Performance of Quality Assurance Functions by Non-NASA Organizations

4.1 Overview

- 4.1.1 This chapter provides general requirements for NASA contract quality assurance functions that are delegated to non-NASA Government agencies and/or assigned to support contractors. Specific requirements for work performed by delegated agencies, support contractors, and third parties are provided in Chapters 5, 6, and 7, respectively.
- 4.1.2 NASA Government contract quality assurance functions may be performed by NASA civil service employees or by a delegated Federal agency (e.g., DCMA). Certain functions, as outlined in Chapters 6 and 7, may also be performed by quality assurance support contractors or by an authorized third party (e.g., accredited quality system registrar, Nadcap special process accreditation). Government contract quality assurance functions performed by support contractors are required by FAR Part 46 to be performed under the direction of Government personnel.

4.2 NASA Technical Direction

The NASA SMA Lead shall act as a liaison for providing technical direction and recommendations to delegated agencies and support contractors on matters related to the following, as applicable (Requirement 43224):

a. Review and approval functions as defined in NASA requirement documents (e.g.,

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NASA Directives, NASA-STDs) and as contractually specified.

- b. Determination of the adequacy of fabrication, repair, and inspection processes, procedures, and techniques; inspection and test conditions, mandatory inspection points, workmanship standards, and conformance criteria; change control activity; the extent of retest after repair, modification, or substitution; and the adequacy of documentation related to these determinations.
- c. Preparation of procedures, techniques, and plans for the evaluation of supplies and services.
- d. Assessment of contractor quality assurance activities, including control over subcontractors.
- e. Visits to contractor facilities to validate delegated or tasked work-hours, resolve conflicts between the delegated agency or quality assurance support contractor and the contractor, and to evaluate performance, including the adequacy of hardware/software nonconformance dispositions, corrective actions, and their related documentation and records.
- f. Assistance in the interpretation of contract requirements related to safety, quality, and mission assurance, as coordinated with and concurred in by the contracting office.
- g. Guidance in the development and operation of nonconformance and corrective action systems.
- h. Processing MRB actions and dispositioning nonconforming material.
- i. Evaluation of deviations, waivers, and engineering changes for safety, reliability, maintainability, or quality impacts.

4.3 Coordination of NASA Quality Assurance Functions

When there are multiple NASA delegations and/or tasks at a contractor's facility, duplication of effort and inconsistent surveillance methodologies are to be avoided. Prior to providing a new delegation and/or quality assurance support contractor tasking, NASA SMA Leads shall coordinate their efforts to:

- a. Establish agreement among the delegating activities for interpretation of common requirements (Requirement 43235).
- b. Establish agreement among the delegating activities for acceptance or rejection of delegated agency or surveillance support contractor operational methods (Requirement 43236).
- c. Place common requirements on the delegated agency or surveillance support contractor for similar supplies and services (Requirement 43237).

4.4 Selection of Organizations Performing Quality Assurance Functions

4.4.1 Program/project offices or the Center SMA office, as delegated by the Center Director, shall select/assign the organization that will be responsible for performing Government contract quality assurance functions (NASA civil servants, a delegated agency, quality assurance support contractor, or an authorized third party) based on the

qualifications and abilities of the organization in relation to the needs and objectives of the quality assurance function(s) (Requirement 43239).

- 4.4.2 The following factors shall be evaluated in the selection of an organization to perform quality assurance functions (Requirement 43240):
- a. Final product acceptance is defined in 48 CFR Subpart 7.5 as an inherently Governmental function that may only be performed by NASA or other Federal agency personnel.
- b. Quality assurance actions which verify compliance with critical contract requirements shall be performed by Federal agency personnel or under the direction and supervision of Federal agency personnel.
- c. The long-term availability of personnel for the duration of the contract support.
- d. Ability to provide quick response time.
- e. Ability to implement specialized surveillance.
- f. Technical, programmatic, product, and process training, qualifications, and certifications.
- g. The availability of inspection and test facility.
- h. The delivery schedule requirements.
- i. Contract quality provisions including frequency and timing of inspections/monitoring.
- j. The technical nature of the product and specialized skills/knowledge needed.
- k. The location of other delegations or task orders at nearby facilities.

4.5 Planning Conference

- 4.5.1 A quality assurance planning conference between NASA and the delegated agency or quality assurance support contractor ensures that support requirements, operating channels, and procedures are thoroughly/mutually understood prior to transmitting LODs or task orders. A face-to-face meeting is required when the contractor under surveillance has no previous history or when there are critical or complex processes involved.
- 4.5.2 The NASA SMA Lead, in coordination with the contracting office technical representative and other interested/authorized contracting office attendees, shall conduct the planning conference prior to the post-contract award conference (Requirement 43254).
- 4.5.3 The NASA SMA Lead shall ensure that the planning conference includes discussions of the following:
- a. Contract and subcontract quality requirements (Requirement 43256).
- b. End-use and criticality of supplies and services (Requirement 43257).
- c. Current procedures and general operations, particularly those applicable to supplies and services similar to those being procured (Requirement 43258).

- d. Technical direction to be given to the contractor (Requirement 43259).
- e. Functions to be delegated or tasked and the performance desired (Requirement 43260).
- f. Special skills, knowledge, qualifications, training, and certifications required (Requirement 43261).
- g. Quality assurance functions to be performed at the contractor's facility by NASA personnel (Requirement 43262).
- h. Channels of communication (Requirement 43263).
- i. Past quality assurance history of the contractor, known contractor deficiencies, and the contractor's progress in correcting deficiencies (Requirement 43264).
- j. MRB authority (Requirement 43265).
- k. Redelegation and flowdown of requirements (Requirement 43266).
- I. Interface situations arising from partial delegations, Department of Defense delegations, or other NASA delegations in the same facility (Requirement 43267).
- m. Response time for mandatory inspections (Requirement 43268).
- n. NASA, delegated agency, and contractor responsibilities related to the reporting, tracking, corrective action resolution, and closure of contract nonconformances (Requirement 43269).

4.6 Management of Delegated Functions

- 4.6.1 NASA Center Directors shall develop and implement procedures to monitor and control hours associated with the performance of delegated/assigned functions (Requirement 43271 4.6.1(1). The purpose for monitoring/controlling hours is to assure that the Center is receiving equitable Government contract quality assurance services for the amount funded and that funding amount will be sufficient to allow performance of all required services.
- 4.6.2 The NCASPG shall agree in advance to the planned level of CAAS support and shall examine for reasonableness the hours reported and charged (Requirement 43273).
- 4.6.3 NASA Center Directors shall report any significant changes in the overall estimate (a variation of more than 15 percent) to the NASA Headquarters Office of the Chief Financial Officer and to the NASA Headquarters Office of Safety and Mission Assurance (Requirement 43274).

4.7 Monitoring of Delegated Agency and Support Contractor Performance

- 4.7.1 NASA SMA Leads shall establish management controls to ensure adequate performance of delegated/tasked quality assurance functions (Requirement 43276).
- 4.7.2 NASA SMA Leads shall evaluate performance on a continuing basis to ensure that LOD and support contract requirements are complied with and remain current (Requirement 43277 4.7.2(1).

Note: Evaluation activities can include independent assessments, surveys, periodic review of plans and reports, observation of performance, and evaluations and assessment of work-hour reporting.

- 4.7.3 NASA SMA Leads shall provide evaluation results to the delegated agency/quality assurance support contractor (Requirement 43279).
- 4.7.4 Contracting officers shall incorporate requirements into LODs and support contracts for delegated agencies and quality assurance support contractors to monitor their own performance and resource utilization and provide performance measurement data to NASA on a specified periodic basis (Requirement 43280).

4.8 Inadequate Quality Assurance Support

- 4.8.1 Upon discovery that the delegated agency or the quality assurance support contractor is providing inadequate quality assurance support that does not comply with the LOD or support contract, as applicable, the contracting officer, in coordination with the NASA SMA Lead, shall formally request corrective action from the delegated agency or support contractor (Requirement 43282).
- 4.8.2 The existence of one or more of the following conditions constitutes inadequate quality assurance support:
- a. Lack of an adequate plan describing quality assurance functions to be performed.
- b. Unsatisfactory performance of delegated and/or contracted functions, as evidenced by:
- (1) NASA observations.
- (2) Inadequate quality of delivered supplies or services.
- (3) Mishaps or process escapes revealing significant contractor quality system inadequacies.
- c. Unsatisfactory or untimely reports or records demonstrating proper implementation of delegated or tasked quality assurance functions (e.g., quality status reports, process flow charts, audit records).
- d. Use of unqualified personnel.
- e. Lack of adequate and/or untimely resource reporting to NASA.
- f. Inadequate allocation of internal resources (personnel or funding).

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